

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

| | | |
|--|---|--|
| John Doe, |) | Civil Action No. 3:18-cv-00161-TLW-PJG |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| |) | DEFENDANTS’ |
| University of South Carolina, Harris |) | RESPONSES TO LOCAL RULE 26.01 |
| Pastides, individually and as agent for |) | INTERROGATORIES |
| the University of South Carolina, Alisa |) | |
| Liggett, individually and as agent for the |) | |
| University of South Carolina, Carl |) | |
| Wells, individually and as agent for the |) | |
| University of South Carolina, Dennis |) | |
| Pruitt, individually and as agent for the |) | |
| University of South Carolina, |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, Defendants submit the following answers to interrogatories as required by the Court:

1. State the full name, address and telephone number of all personal or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE #1:

None.

2. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE #2:

These Defendants request a jury trial, because damages are being sought.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent; subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE #3:

Not applicable.

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE #4:

No challenge is made by these Defendants to the appropriateness of the division.

5. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number in the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happening or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE #5:

These Defendants are not aware of any related action that is currently pending in the United States District Court for the District of South Carolina.

6. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE #6:

Not applicable.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE #7:

These Defendants are not currently aware of any such party or entity that is not already named to this suit..

Respectfully submitted,

DAVIDSON, WREN & PLYLER, P.A.

BY: s/ Kenneth P. Woodington

WILLIAM H. DAVIDSON, II, Fed. I.D. No. 425

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ATTORNEYS for Defendants

February 22, 2018